

JOSEPH P. RUSSONIELLO (CABN 44332)
United States Attorney

BRIAN J. STRETCH (CABN 163973)
Chief, Criminal Division

CHRISTINE Y. WONG (NYBN 3988607)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102
Telephone: (415) 436-7301
Facsimile: (415) 436-6753
E-Mail: Christine.Wong@usdoj.gov

Attorneys for the United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA

v.

DONALD DANIELS, et al.,

Defendants.

No. 09-0862 MHP

STIPULATION AND ~~PROPOSED~~
ORDER DOCUMENTING WAIVER

On October 19, 2009, defendants Donald Daniels, Martin William Washburn, Irina Rebegeneau, Sergei Shkurkin and Tapani Koivunen appeared the Honorable Marilyn H. Patel for a trial setting hearing. The Court ordered that the parties next appear on November 16, 2009 for a status conference. The parties requested, and the Court ordered, that time be excluded under the Speedy Trial Act from October 19, 2009, through November 16, 2009, to allow the Government to continue to produce discovery to the defendants and for the defendants to review discovery.

On November 16, 2009, defendants Donald Daniels, Martin William Washburn, Irina Rebegeneau, Sergei Shkurkin and Tapani Koivunen appeared the Honorable Marilyn H. Patel for a trial setting hearing. The Court ordered that the parties next appear on January 25, 2010 for a status conference. The parties requested, and the Court ordered, that time be excluded under the Speedy Trial Act from November 16, 2009, through January 25, 2010, to allow the Government to continue to produce discovery to the defendants and for the defendants to review discovery.

With the agreement of the parties and with the consent of the defendants, the Court enters this order confirming the exclusion of time under the Speedy Trial Act from October 19, 2009, through January 25, 2010. The parties agree and stipulate, and the Court finds and holds, as follows:

The ends of justice served by excluding the period from October 19, 2009 through January 25, 2010 from Speedy Trial Act calculations outweighs the interests of the public and the defendants in a speedy trial, by ensuring the effective preparation of counsel, in accordance with 18 U.S.C. § 3161(h)(8)(A) and (B).

STIPULATED:

DATED: November 23, 2009

/s Mary McNamara
MARY MCNAMARA, ESQ.
Attorney for DONALD DANIELS

DATED: November 23, 2009

/s Nanci Clarence
NANCI CLARENCE, ESQ.
Attorney for MARTIN WILLIAM WASHBURN

DATED: November 23, 2009

/s Anthony Brass
ANTHONY BRASS, ESQ.
Attorney for IRINA REBEGENEAU

DATED: November 23, 2009

/s Anthony Brass
HARRY SINGER, ESQ.
Attorney for TAPANI KOIVUNEN

1
2 DATED: November 23, 2009

/s Anthony Brass
WILLIAM J. PORTANOVA, ESQ.
Attorney for SERGEI SHKURKIN

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6 DATED: November 23, 2009

/s Christine Y. Wong
CHRISTINE Y. WONG
Assistant United States Attorney

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8 IT IS SO ORDERED.

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10 DATED: November 24 2009

HON. MARILYN H. PATEL
United States District Judge

